

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

United States of America, *ex rel.*
Charles R. Shepherd; Danny V. Rude;
Robert Scott Dillard; Rickey Mackey,

Plaintiff-Relators,

v.

Fluor Corporation, Inc.;
Fluor Intercontinental, Inc.,

Defendants.

C/A No.: 6:13-cv-02428-TMC

**JOINT MOTION FOR STATUS
CONFERENCE**

Relators Charles R. Shepherd, Danny V. Rude, Robert Scott Dillard, and Rickey Mackey (collectively, “Relators”), and Defendants Fluor Corporation and Fluor Intercontinental, Inc. (collectively, “Fluor”), by and through undersigned counsel, jointly move this Court for an Order scheduling a status conference to discuss amending the Amended Scheduling Order. (ECF No. 190). The Parties respectfully submit that in light of the complexity of this case, the discovery issues reflected in the Parties’ respective answers to the Local Rule 26.03 Interrogatories, and the ongoing Coronavirus pandemic, the current Amended Scheduling Order does not give the Parties sufficient time to conduct discovery and prepare to litigate this case.

Therefore, based on the foregoing, the Parties respectfully request that the Court issue an Order scheduling a status conference to discuss amending the Amended Scheduling Order.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

s/ Mark C. Moore

Mark C. Moore (Fed. ID No. 4956)
Konstantine P. Diamaduros (Fed. ID No. 12368)
NEXSEN PRUET, LLC
1230 Main Street, Suite 700
Columbia, SC 29201
Telephone: (803) 540-2146
Facsimile: (803) 727-1458
MMoore@nexsenpruet.com
KDiamaduros@nexsenpruet.com

Craig D. Margolis (admitted *pro hac vice*)
Tirzah S. Lollar (admitted *pro hac vice*)
Christian Sheehan (admitted *pro hac vice*)
Arnold & Porter Kaye Scholer LLP
601 Massachusetts Ave. NW
Washington, D.C. 20001-3743
Telephone: (202) 942-6127
Facsimile: (202) 942-5999
craig.margolis@arnoldporter.com
tirzah.lollar@arnoldporter.com
christian.sheehan@arnoldporter.com

*Attorneys for Defendants Fluor Corporation and
Fluor Intercontinental, Inc.*

s/ Richard A. Harpootlian

Richard A. Harpootlian (Fed. ID No. 1730)
Christopher P. Kenney (Fed. ID No. 11314)
RICHARD A. HARPOOTLIAN P.A.
1410 Laurel Street
Post Office Box 1090
Columbia, SC 29202
Telephone: (803) 252-4848
Facsimile: (803) 252-4810
rah@harpootlianlaw.com
cpk@harpootlianlaw.com

Anand Swaminathan
LOEVY & LOEVY
311 N. Aberdeen St., Third Floor
Chicago, IL 60607
Telephone: (312) 243-5900
Facsimile: (312) 243-5902
anand@loevy.com

*Attorneys for Relator Charles R. Shepherd
and Danny V. Rude*

s/ Frank L. Eppes
Frank L. Eppes (Fed. ID No. 1003)
EPPES & PLUMBLEE, PA
PO Box 10066
Greenville, SC 29603
Telephone: (864) 235-2600
Facsimile: (864) 235-4600
feppes@eppesandplumblee.com

Attorney for Relator Robert Scott Dillard

s/ Judah N. VanSyckel
Judah N. VanSyckel (Fed. ID No. 12778)
Saluda Law, LLC
137 E. Butler Street
Lexington, SC 29072
Telephone: (803) 939-6927
Facsimile: (803) 902-8004
judah@saludalaw.com

Attorney for Relator Rickey Mackey

July 1, 2020
Columbia, South Carolina